

1 Scott E. Davis  
State Bar No. 016160  
2 SCOTT E. DAVIS, P.C.  
8360 E. Raintree Drive, Suite 140  
3 Scottsdale, AZ 85260

4 Telephone: (602) 482-4300  
Facsimile: (602) 569-9720  
5 email: [davis@scottdavispc.com](mailto:davis@scottdavispc.com)

6 Steven J. Parsons  
Nevada State Bar No. 363  
7 Law Offices of Steven J. Parsons  
10091 Park Run Drive, Suite 200  
8 Las Vegas, NV 89145

9 Telephone: (702) 384-9900  
Facsimile: (702) 384-5900  
10 Email: [Steve@SJPLawyer.com](mailto:Steve@SJPLawyer.com)

11 *Attorneys for Plaintiff Michele Cosgrove*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 Michele Cosgrove,  
16

17 Plaintiff,

18 v.

19 The Prudential Insurance Company of America;  
Harrah's Operating Company, Inc.; Harrah's  
20 Operating Company, Inc. Long Term Disability  
Plan,

21 Defendants.  
22

Case No. 2:19-cv-00110-GMN-GWF

**STIPULATED MOTION TO  
EXTEND DEADLINE TO FILE  
PROPOSED DISCOVERY  
PLAN/SCHEDULING ORDER BY  
SIXTY (60) DAYS**

23 The parties hereby stipulate and move the Court for an Order extending their  
24 deadline to file the Proposed Discovery Plan/Scheduling Order by sixty (60) days, or  
25 until June 14, 2019.  
26

1 Pursuant to the Court's March 1, 2019 Minute Entry (Dkt. #5), the parties' current  
2 deadline to file the Proposed Discovery Plan/Scheduling Order is Monday, April 15,  
3 2019.

4 The reason for the parties' stipulation is that it is not clear at this time whether the  
5 Harrah's defendants can be dismissed from this matter without prejudice and/or whether  
6 they need to remain in this lawsuit. At this time, the Harrah's defendants have been  
7 served, but have not yet Answered or otherwise responded to Plaintiff's Complaint. The  
8 Harrah's defendants' Answer or response to Plaintiff's Complaint is due to be filed no  
9 later than April 25, 2019.

10 Extending the deadline for the parties to file their Proposed Discovery  
11 Plan/Scheduling Order will give them additional time to resolve this issue, which would  
12 bring clarity to the Proposed Discovery Plan/Scheduling Order as well as who the parties  
13 are that will be in the lawsuit at that time and who will participate in preparing the  
14 Proposed Discovery Plan/Scheduling Order. Extending the deadline would also avoid the  
15 parties having to file a second Proposed Discovery Plan/Scheduling Orders, if they  
16 determine the Harrah's defendants cannot be dismissed from this matter.

17 Therefore, with good cause appearing, the parties respectfully move for the Court  
18 to grant their stipulation.

19 RESPECTFULLY REQUESTED this 9<sup>th</sup> day of April, 2019.

20 /s/ Julie M. Kamps, Esq.  
21 Julie M. Kamps, Esq.  
22 Attorney for Prudential

/s/ Scott E. Davis, Esq.  
Scott E. Davis, Esq.  
Steve J. Parsons, Esq.  
Attorneys for Plaintiff

**ORDER**

23 **IT IS SO ORDERED.**

24 Dated: \_\_\_\_\_ April 10, 2019.

25   
26 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE